

# Threatened Species Detection Report

## Mt. Cole State Forest

### Coupes 185-000-0015 & 185-000-0016

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## ABSTRACT

Victorian National Parks Association representatives met with VicForests on the 10<sup>th</sup> of February 2020 to discuss Vicforests' operations in the Pyrenees and Mount Cole State Forests in Victoria.

During this meeting, issues raised regarding the conservation of biodiversity values were met with concerning replies. We discuss these concerns in the "*Concerns under the Code Of Practice For Timber Production 2014*" section below.

The following threatened species detection report outlines the results of forest field surveys undertaken between the 31<sup>st</sup> of January and the 2<sup>nd</sup> of February within the Midlands Forest Management Area specifically within the Mount Cole State Forest near Raglan.

The target species searched for during field surveys within forest areas scheduled for logging included the Mount Cole Grevillea (*Grevillea montis-cole* subsp. *montis-cole*) and the Grampians Bitter-pea (*Daviesia laevis*). A desktop survey was also undertaken to search for records of other rare and threatened species.

The Mount Cole Grevillea is listed as a threatened species under the *Flora and Fauna Guarantee Act 1988* (FFG Act), and was recently assessed as Critically Endangered by the current *Conservation Status Assessment Project* in Victoria. This project is aiming to establish a consistent approach to assessing and listing threatened species across Australia using International Union for Conservation of Nature (IUCN) assessment criteria and is conforming to standards developed by a national working group.

Our findings indicate that multiple threatened species are likely to occur within logging coupes scheduled in VicForests' Approved Timber Utilisation Plan (2019), including within coupes 185-000-0015 & 185-000-0016. In particular, active searching by citizen scientists for rare and threatened flora species within coupes 185-000-0015 & 185-000-0016 discovered and recorded the location of a new and significant population of the Mount Cole Grevillea.

### **This report will document:**

- Methods of survey work
- Our concerns under the Code of Practice for Timber Production 2014
- Results of survey work

## METHODS

### Survey technique

- An active search and ground based visual assessment was undertaken within the VicForests scheduled logging coupes detailed within this report. Field surveys for threatened flora consisted of groups of 4 individuals spaced 5 meters apart who walked within and adjacent to the coupes whilst searching for rare or threatened flora species.
- Digital cameras were used to record and document species observed.
- Global Positioning Systems (GPS) were used to document the location of plants found.
- A desktop survey was undertaken to search for records of rare and threatened species contained within the Victorian Biodiversity Atlas (DELWP) database. Additional locations of one of the investigation's target species, the Mt Cole Grevillea, were also identified within the Atlas of Living Australia online database (<https://www.ala.org.au/>).

### Concerns under the Code of Practice for Timber Production 2014 (The Code)

#### Lack of Pre-logging Surveys

During a meeting on the 10<sup>th</sup> February 2020 with VicForests representatives, it was confirmed that pre-logging survey work was not being undertaken by DELWP or independent ecological consultants prior to the logging of coupes within the Mount Cole State Forest and surrounding state forest areas in the Midlands FMA or the Western Community Forestry Area in general.

It was then further added that any pre-logging 'checking' of coupes that is being undertaken is being done so by VicForests foresters themselves, due to DELWP being 'busy'.

The West RFA area has the highest number of nationally threatened species of any of the RFA areas, with more than double that of East Gippsland and Central Highlands (*Assessment of matters pertaining to the modernisation of Victoria's Regional Forest Agreements 2019*). The forests of Mt. Cole contain many threatened and endemic species found nowhere else on earth.

Our concerns remain around the lack of un-biased pre-logging survey work occurring and that any work being undertaken is potentially carried out by un-qualified VicForests personnel. These concerns are heightened by the presence in the area of listed threatened species such as the endemic Mount Cole Grevillea (which has an extremely restricted range), the Grampians Bitter-pea, the Powerful Owl (*Ninox strenua*), and the Square-tailed Kite (*Photinia isura*), all of which are threatened by logging operations.

The lack of pre-logging survey work and survey work being undertaken by persons with a conflict of interest or lack of adequate skills and knowledge, raises issues under *The Code*, specifically under

section 2.2.2 dealing with Conservation of Biodiversity, Mandatory Actions, Addressing biodiversity conservation risks considering scientific knowledge (page 34). We have particular concerns relating to the following sections:

- 2.2.2.2 The precautionary principle must be applied to the conservation of biodiversity values.
- 2.2.2.4 During planning identify biodiversity values listed in the Management Standards and Procedures.
- 2.2.2.5 Protect areas excluded from harvesting from the impacts of timber harvesting operations.

We have previously submitted reports for threatened species in the Mt. Cole area and it is still unclear if pre-logging survey work for threatened species is done by DELWP and the Western FMA's.

### **Logging in Mount Cole Grevillea habitat while an Action Statement is not yet developed**

The VicForests 2019 Timber Utilisation Plan has included a steep increase in the number of coupes located within the Mt. Cole State Forest including many coupes that are placed within the known distribution of the Mt. Cole Grevillea.

The rise in intensity of planned logging types (from "single tree" to high intensity "even aged stand management") within the Mountain Cole Grevillea's known distribution and hotspot areas is concerning and indicates a lack of due diligence.

In 2019 the Mt. Cole Grevillea was listed as a threatened species under the *Flora and Fauna Guarantee Act 1988* after the Scientific Advisory Committee (SAC) recommended the species for listing due to "a likely environmental domain contraction in the order of 75%" and continued decline due to on-going threats.

The SAC's recommendation for listing the species as threatened, which was accepted by the Victorian Government, notes the direct impact that logging has had on Mt. Cole Grevillea:

*"On the basis of vegetation and land use patterns at Mount Cole, associated disturbances such as logging are strongly implicated in this decline."*

A direct implication of the identified threats posed by logging on the Mount Cole Grevillea requires responsive management action such as is set out within *The Code* under section 2.2.2 *Conservation of Biodiversity, Mandatory Actions, Addressing biodiversity conservation risks considering scientific knowledge* (page 34). In particular, a precautionary approach must be taken to the management of Mount Cole Grevillea:

- 2.2.2.2 The precautionary principle must be applied to the conservation of biodiversity values.

Logging should cease in known Mt. Cole Grevillea habitat as the species is critically endangered and logging has been identified as a direct threat to the species' persistence in the wild.

### Threatened Species habitat within logging coupe

A desktop survey of coupe 185 000 0105 using the Atlas of Living Australia and Victorian Biodiversity Atlas shows records of many rare and threatened species within the immediate surrounding area. These species are listed below in Figure 1.

Suitable habitat for Powerful Owls is present within the coupe. It is unclear if Powerful Owl Management Areas (POMA) have been established at Mt. Cole and where they are placed to meet rules set out in Table 3 Fixed FMZ rules for fauna of the *Planning Standards for timber harvesting operations in Victoria's State forests 2014*.

Suitable habitat for Yarra Gum (*Eucalyptus yarraensis*) is also present within the more damp areas to the west of the coupe, as well as individual trees recorded within the coupe area.

Concerns are also held for other rare and threatened species known to occur at Mt. Cole such as Penny-leaf Flat-pea (*Platylobium rotundum*) and Grampians Bitter-pea (*Daviesia laevis*) which could also be present within the coupe.

With such a high density of threatened species within and around the two coupes, there is a considerably need for adequate surveying to be undertaken at the site.

Proper adherence to section 2.2.2 of the Code of Practice for Timber Production is necessary, and a precautionary approach must be taken in the management of listed threatened species and the conservation of biodiversity values.

Logging should cease in known Mt. Cole Grevillea habitat due to logging being identified as having a negative impact on the species' persistence in the wild as well as being a threat to the other threatened species present in the coupes.

Species	Common Name	Status
<i>Ninox strenua</i>	Powerful Owl	FFG: Threatened
<i>Boronia nana</i> var. <i>pubescens</i>	Dwarf Boronia	Rare (Advisory list of rare of threatened plants in Victoria -2014)
<i>Eucalyptus yarraensis</i>	Yarra Gum	Rare (Advisory list of rare of threatened plants in Victoria -2014)
<i>Bossiaea cordigera</i>	Wiry Bossiaea	Rare (Advisory list of rare of threatened plants in Victoria -2014)
<i>Anthochaera phrygia</i>	Regent Honeyeater	FFG: Threatened EPBC: Critically endangered

Figure 1. Rare and threatened species within coupes 185-000-0015 & 185-000-0016 and the surrounding area, as recorded in the Atlas of Living Australia and the Victorian Biodiversity Atlas

### **Logging in areas assessed to become national park by VEAC**

Coupes 185-000-0015 & 185-000-0016 are within the area of Mt. Cole found to be worthy of being included in the national parks estate as recommended by the Victorian Environmental Assessment Council in the Central West Investigation Final Report (2019) which took place over three years with extensive public consultation.

The area is part of the proposed Mount Buangor National Park to be reserved for its significant natural and cultural values. These values include the head waters of the Wimmera River, the Fiery Creek catchment, the popular Beeripmo walking track and natural values such as the endangered Mount Cole Grevillea which occurs in the Fiery Creek catchment.

The creation of Mount Buangor National Park would make a significant contribution to achieving a comprehensive, adequate and representative reserve system (CAR) by increasing the protection of a number of priority Ecological Vegetation Classes (EVCs) that are endangered and depleted in the region.

The current government is yet to make a decision about proposals for 60,000 ha of new national parks in Victoria's central west, in the Wombat, Wellsford, Mt Cole and Pyrenees State Forests. After four years of government sponsored investigation and consultation, the government missed its statutory deadline to make a decision in late February 2020.

Traditional Owners have particular concerns about the protection of the Wimmera River and Fiery Creek and their catchments (VEAC 2019), where coupes 185-000-0015 & 185-000-0016 are located within.

The proximity of the coupes to the Smith Bridge Camp ground is also of concern; clearing of vegetation near or around the popular camp ground will degrade the aesthetics of the area. This would impact visitor enjoyment of the area which brings in many tourists to the region as well as being an important place for locals.

The north west corner of coupe 185-000-0016 will also heavily impact the Beeripmo Walk, and will impede on the amenity of the walk and affect the visitation and tourism value of area.

Map 2 shows the population of Mt. Cole Grevillea detected by VNPA citizen scientists in the Fiery Creek catchment area. The map also shows the proposed national park as well as impacted recreational assets around the coupes such as camp grounds and Beeripmo Walk.

The logging of coupes 185-000-0015 & 185-000-0016 will impact on the persistence of the Mt. Cole Grevillea, impact the hydrology of the Fiery Creek catchment and degrade public enjoyment of the area.

We have concerns that VicForests will undertake logging prior to a decision being made on the VEAC recommendations. We also have concerns around the clearing of poorly reserved and threatened EVCs being cleared that are needed to meet JAVIS criteria for a comprehensive, adequate and representative reserve system. These criteria are referred to in The Code of Practice for Timber Production under section 4.6.7.1 *Maintain a CAR reserve system within the FMAs consistent with the JANIS criteria.*

## RESULTS OF SURVEY WORK

Active searching by citizen scientists for rare and threatened flora species within coupes 185-000-0015 & 185-000-0016 discovered and recorded the location of a new and significant population of the threatened Mount Cole Grevillea.

GPS waypoint locations marked the approximate minimum extent of the grevillea population. The population was close to a track. These waypoint locations are provided in Table 1 below and the minimum population extent is displayed on Map 1 below.

Table 1. Waypoint locations of Mt Cole Grevillea within the surrounding area of coupes 185-000-0015 & 185-000-0016

Mount Cole Grevillea photo locations at coupes 185-000-0015 and 185-000-0016		
Location ID	Record type	Location (GDA94/UTM)
IMGU0011	Mount Cole Grevillea photo location	54 H 702684 5869880
IMGU0012	Mount Cole Grevillea photo location	54 H 702902 5869872
IMGU0013	Mount Cole Grevillea photo location	54 H 702904 5869870
IMGU0014	Mount Cole Grevillea photo location	54 H 702926 5869856
IMGU0015	Mount Cole Grevillea photo location	54 H 702926 5869856
IMGU0016	Mount Cole Grevillea photo location	54 H 702904 5869858
IMGU0018	Mount Cole Grevillea photo location	54 H 702900 5869865
IMGU0019	Mount Cole Grevillea photo location	54 H 702900 5869864
IMGU0020	Mount Cole Grevillea photo location	54 H 702889 5869869
IMGU0021	Mount Cole Grevillea photo location	54 H 702825 5869890
IMGU0022	Mount Cole Grevillea photo location	54 H 702822 5869890

Also displayed on Map 1 are:

- recommended minimum 200m buffers to exclude all logging activities for the protection of the Mount Cole Grevillea population and other threatened species from disturbance
- existing rare and threatened species locations contained within the Victorian Biodiversity Atlas and threatened species records from the Atlas of Living Australia online database (<https://www.ala.org.au/>)
- recommended 200m buffers for the locations of Dwarf Boronia contained within these databases.

Photographs of the Mount Cole Grevillea population detected within coupes 185-000-0015 & 185-000-0016 are displayed below.

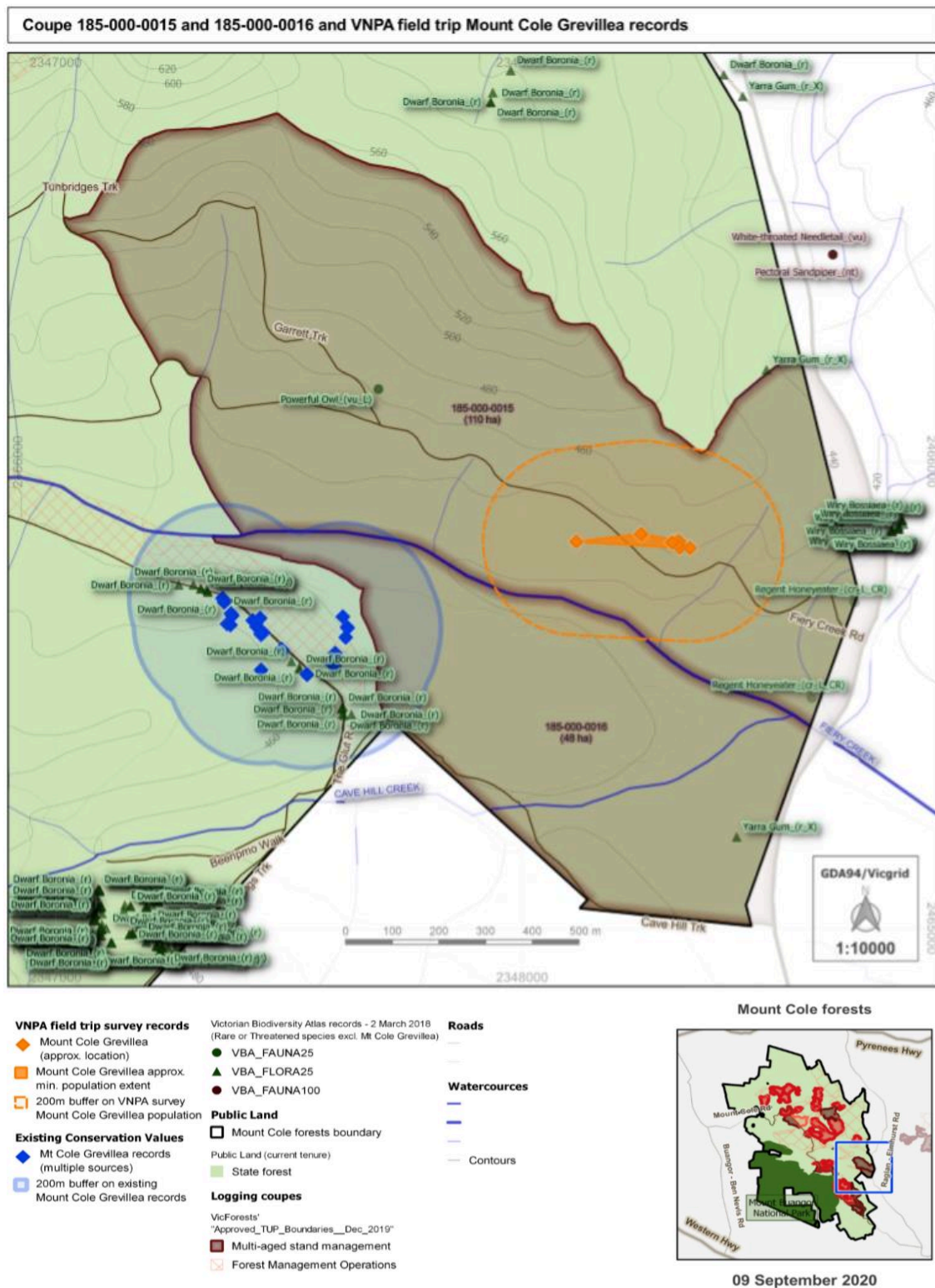


Photographs: Mt. Cole Grevilliea (*Grevillea montis-cole* subsp. *montis-cole*) on management track.

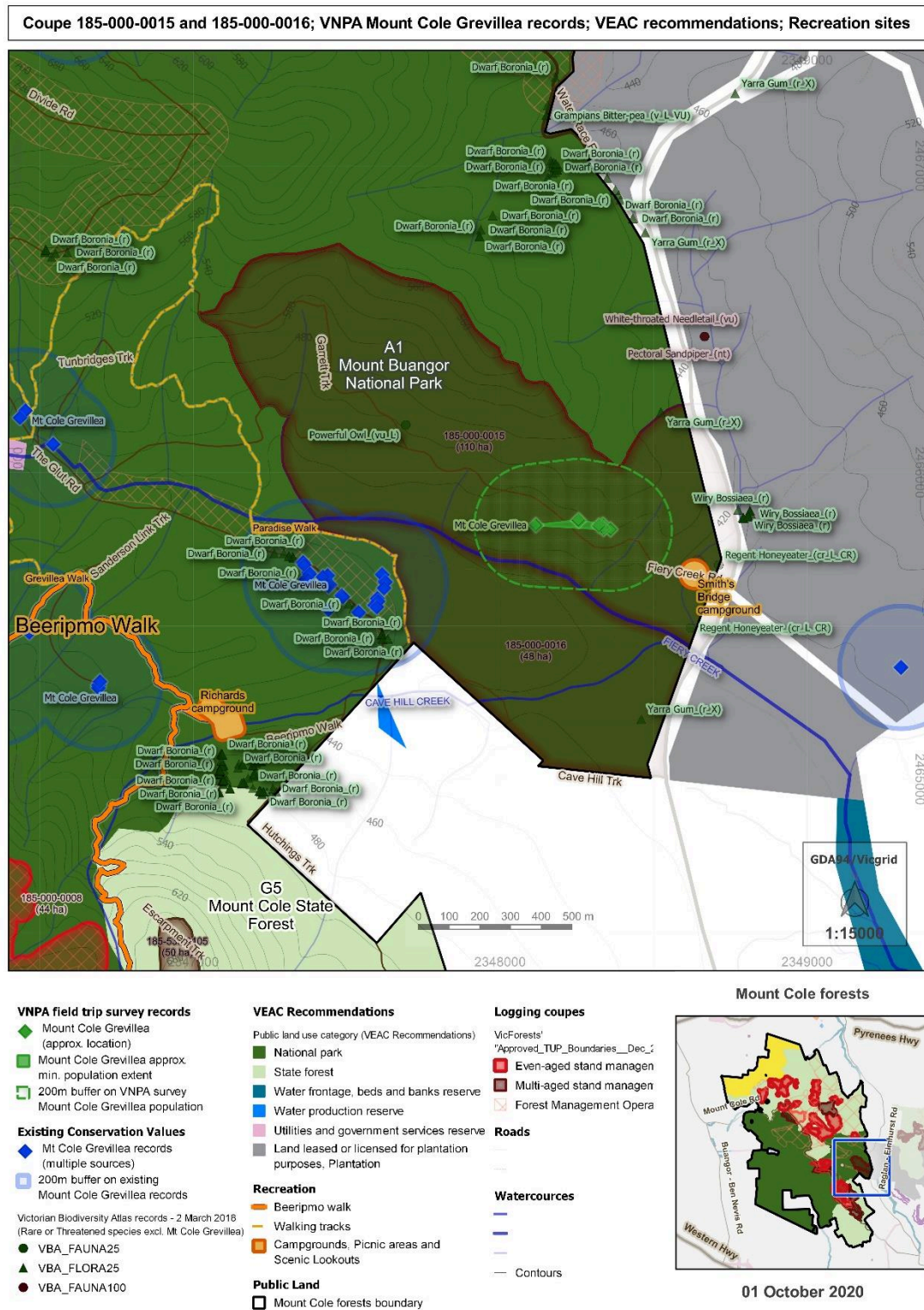




**Map 1. Mt. Cole Grevillea plants found during VNPA Field Trip**



**Map 2.** Mt. Cole Grevillea plants found during VNPA Field Trip with VEAC Central West overlay and recreational assets



## DISCUSSION AND RECOMMENDATIONS

Mt. Cole State Forest is within the West Regional Forest Agreement (RFA) area under the Midlands Forest Management Area (FMA).

The *Assessment of matters pertaining to the modernisation of Victoria's Regional Forest Agreements* (Commonwealth of Australia, Victorian State Gov 2019) found that the West RFA area was high in conservation and biodiversity values.

The West RFA region has the highest number of national listed (EPBC Act) species of any RFA region in Victoria with 115 list species, more than double those in East Gippsland and Central Highlands. This includes the highest number of critically endangered species of any RFA region (16).

The West RFA region also has nine nationally listed ecological communities, the highest in the state along with Gippsland.

As displayed in the report, the cavalier attitude of VicForests towards conservation values and lack of independent qualified survey work and oversight is putting threatened species at risk in the west.

### **The VNPA recommends the following:**

- That VicForests cease all active and future logging at Mt. Cole within the distribution of the threatened Mt.Cole Grevillea which has experienced a population contraction of 75% in recent decades.
- That urgent surveys of coupes 185-000-0015 & 185-000-0016 and the surrounding coupes be undertaken for threatened species in the area
- That surveys are conducted by independent and suitably qualified persons and that the survey results are publicly released
- That surveying be undertaken over an adequate period to detect species that appear seasonally such as orchids and wildflowers
- That VicForests be investigated for breaches of *The Code of Practice for Timber Production* under Section 2.2.2 *dealing with Conservation of Biodiversity, Mandatory Actions, Addressing biodiversity conservation risks considering scientific knowledge* (page 34) particularly:
  - 2.2.2.2 The precautionary principle must be applied to the conservation of biodiversity values.
  - 2.2.2.4 During planning identify biodiversity values listed in the Management Standards and Procedures
  - 2.2.2.5 Protect areas excluded from harvesting from the impacts of timber harvesting operation
  - 4.6.7.1 Maintain a CAR reserve system within the FMAs consistent with the JANIS criteria
- If formal or informal protection zones for threatened species exist at Mt. Cole, the details of these Special Protect Zones (SPZs) and the reasons for their establishment should be publically released.

## References

- Department of Environment and Primary Industries (2014). Code of Practice for Timber Production. [https://www.forestsandreserves.vic.gov.au/\\_data/assets/pdf\\_file/0016/29311/Code-of-Practice-for-Timber-Production-2014.pdf](https://www.forestsandreserves.vic.gov.au/_data/assets/pdf_file/0016/29311/Code-of-Practice-for-Timber-Production-2014.pdf)
- Flora and fauna guarantee Scientific Advisory Committee (2019), Final Recommendations on a nomination for listing *Grevillea montis-cole* subsp. *montis-cole* R.V.Sm. Mount Cole *Grevillea*
- Victorian Environmental Assessment Council (2019). Central West Investigation Final Report
- Victorian National Parks Association (2017). Western Forest & Woodlands at risk: An assessment of the ecological implications of a new Timber Utilisation Plan for Western Victoria